

The District has received your August 15, 2016 comments on the proposed Title V permit for the facility identified above. The District has carefully considered your comments presented in this letter. The District's response to each item is submitted below. The specific changes to the draft Title V permit are identified in the attached document.

Comment 1: Title Page, Facility Contact, and SIC Code

Ameresco requested that the District delete the comma from the Owner Company name, change the Responsible Official to Nathan W. Hall, change the Facility Contact to Kevin Hubanks, and change the SIC code to 4931 (Electric and Other Services Combined). Ameresco stated that SIC Code 4931 better represents this facility's operations because it processes both gas and generates electricity.

Response to Comment 1:

The District agrees to make these changes.

Comment 2: The regulatory reference to Regulation 8, Rule 34, Solid Waste Disposal Sites, is incorrect and should be deleted from Condition# 25009 and Table VII-A.

Response to Comment 2:

The District has determined that Regulation 8, Rule 34 applies to equipment processing or burning landfill gas (alone or in combination with other fuels) at off-site and remotely located facilities where landfill gas has been piped from the landfill to another location for subsequent use as fuel or for further processing. The Ameresco Vasco Road facility is located on property owned by the landfill gas generator. In all other cases where energy recovery equipment is burning landfill gas and is located on the landfill owner's property, the District has subjected the energy recovery equipment to the applicable sections of Regulation 8, Rule 34.

Comment 3:

Condition 25009, part 2 requires that the landfill gas methane content supplied to either engine shall be monitored and recorded continuously using a gas chromatograph or other device.

Ameresco stated that the landfill gas methane content is not measured continuously as required by Condition 25009, part 2, but can be measured once per hour.

Response to Comment 3:

The District agrees to replace the word "continuous" in this condition with "once per hour while the engines are operating."

Comment 4: 40CFR60.4233(e) should be deleted from Condition# 25009.5.

Response to Comment 4:

The District agrees to delete the 40CFR60.4233(e) reference in Condition #25009.5 because the NSPS regulates VOC, not NMOC. The VOC limit is in Table VII-A of the Title V permit.

Comment 5: Subsection k of Condition 25009.9 should be deleted.

Response to Comment 5:

The District has determined that a high heating value for the landfill gas in subsection d is correct. The District agrees to delete subsection k, which is the determination of the NMOC destruction efficiency, because the requirement in subsection j to test NMOC concentration in the exhaust gas is sufficient.

Comment 6: Condition 25009.9d should refer to the gas as “LFG fuel,” not landfill gas.

Response to Comment 6:

The District considers the gas to be landfill gas.

Comment 7:

Condition 25010, part 2 requires that the landfill gas methane content supplied to the flare be monitored and recorded continuously using a gas chromatograph or other device.

Ameresco stated that the landfill gas methane content is not measured continuously as required by Condition 25010, part 2, but can be measured once per hour.

Response to Comment 7:

The District agrees to replace the word “continuous” in this condition with “once per hour while the flare is operating.”

Comment 8:

A comment was submitted regarding the automatic start/restart system at A-1.

Response to Comment 8:

The District has determined that the system is an automatic system that is operated continuously by the plant programmable logic controller (PLC). Therefore, we will keep the phrase in permit condition #25010, Part 8.

Comment 9:

Table VII-A: The limit citation for 40CFR60.13 does not apply to the engine sources Table VII-A because the NSPS does not require continuous monitoring.

Response to Comment 9:

The District agrees to delete the 40CFR60.13 citation in Table VII-A.

Comment 10:

Table VII-A: The landfill gas methane content supplied to either engine shall be monitored and recorded periodically with a gas chromatograph in Condition# 25009.2.

Response to Comment 10:

The District agrees to replace the designation “continuous” with “once per hour while the flare is operating.”

Comment 11:

The formaldehyde and Toxic Air Contaminant (TACs) concentration limits in Table VII-B should be deleted.

Response to Comment 11:

The District agrees to delete the formaldehyde and TACs limits in Table VII-B because they are not found in Condition 25010.

Comment 12:

Ameresco recommends that the District set the end of the annual compliance certification period to the end of the calendar year, with the semi-annual monitoring periods corresponding with the date in the Title V permit.

Response to Comment 12:

The District agrees the annual certification year can end on December 31st with the report due on January 31st and that the monitoring reporting periods will be from January 1st through June 30th and July 1st through December 31st, with monitoring reports due on July 31st and January 31st.